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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CHRISTIAN LOVGREN and GINA
CUNEO, individuals on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

ENLOE MEDICAL CENTER, a
California; and Does 1 through 50,
Inclusive,

Defendants.

Case No. 2:24-cv-01134-WBS-DMC

[Class Action]

**JOINT STIPULATION TO SET
BRIEFING SCHEDULE ON
PLAINTIFFS' MOTION TO
REMAND CASE TO STATE COURT;
ORDER**

Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor

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Attorney for Defendant
ENLOE MEDICAL CENTER

1
2 Plaintiffs CHRISTIAN LOVGREN and GINA CUNEO (“Plaintiffs”) and
3 Defendant ENLOE MEDICAL CENTER (“Defendant”) (collectively the “Parties”),
4 by and through their respective counsel of record, hereby stipulate and agree as
5 follows:

6 WHEREAS, on May 16, 2024, Plaintiffs filed and served their Notice of
7 Motion and Motion to Remand Case to State Court, which is set for hearing on
8 March 31, 2025 (Dkt. 14);

9 WHEREAS, the Parties settled the case after a private mediation on January
10 21, 2025, with experienced wage and hour mediator Steven Serratore;

11 WHEREAS, Plaintiffs’ Notice Of Non-Receipt of Opposition filed on
12 February 11, 2025 (Dkt. 17) is hereby withdrawn; and

13 WHEREAS, to prevent the Parties from incurring further potentially
14 unnecessary litigation expenses while they finalize the Parties’ settlement, and in the
15 interests of judicial economy and the conservation of Party resources, the Parties
16 agree that good cause exists to further continue the briefing schedule for Plaintiffs’
17 Motion to Remand Case to State Court:

- 18 • The hearing on Plaintiffs’ Motion to Remand Case to State Court to be
19 continued from March 31, 2025, to April 28, 2025;
20 • Defendant’s opposition deadline to be continued to March 4, 2025; and
21 • Plaintiffs’ reply deadline to be continued to March 11, 2025.

22 NOW, THEREFORE, based upon the foregoing, the Parties, by and through
23 their respective undersigned counsel of record, hereby stipulate and agree as
24 follows:

25 1. The above recitals are an integral part of and provide the foundation for
26 this stipulation;

27 2. Plaintiff’s Notice of Non-Receipt of Opposition (Dkt. 17) is hereby
28

1 withdrawn.

2 3. The briefing schedule for Plaintiffs' Motion to Remand Case to State
3 Court is as follows:

- 4 a. The hearing on Plaintiffs' Motion to Remand Case to State Court
5 to be continued from March 31, 2025, to April 28, 2025;
6 b. Defendant's opposition deadline to be continued to March 4,
7 2025; and
8 c. Plaintiffs' reply deadline to be continued to March 11, 2025.

9 **IT IS SO STIPULATED.**

10
11 Dated: February 11, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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13
14 By: /s/ Sergio J. Puche

15 Jeffrey S. Herman
16 Sergio Julian Puche
17 Trevor G. Moran

18 Attorney for Plaintiffs
19 CHRISTIAN LOVGREN and GINA CUNEO

20 Dated: February 11, 2025

LITTLER MENDELSON, P.C.

21 By: /s/ Barbara A. Blackburn (Authorized on 2/11/2025)

22 Barbara A. Blackburn
23 Douglas L. Ropel
24 Lauren J. Orozco

25 Attorney for Defendant
26 ENLOE MEDICAL CENTER
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ORDER

By stipulation of the Parties, and for good cause shown, the Court hereby Orders as follows:


1. Plaintiff's Notice of Non-Receipt of Opposition (Dkt. 17) is hereby withdrawn.

2. The briefing schedule for Plaintiffs' Motion to Remand Case to State Court is as follows:

- a. The hearing on Plaintiffs' Motion to Remand Case to State Court to be continued from March 31, 2025, to **April 28, 2025 at 1:30 p.m.;**
- b. Defendant's opposition deadline to be continued to **March 4, 2025;** and
- c. Plaintiffs' reply deadline to be continued to **March 11, 2025.**

IT IS SO ORDERED.

Dated: February 12, 2025


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE